

ICC Docket No. 05-0159Staff Cross Exhibit No. 4

Witness _____

**Commonwealth Edison Company's Response to
Staff's (RJZ) Data Requests 1.01 Through 1.74**Date 9-9-05 Reporter CB**Dated: April 14, 2005****REQUEST NO. RJZ 1.07:**

Has the Auction Manager ever had to call a recess or other pause in an auction? Please provide complete details, including complete logs of the events that required such delays in every instance.

RESPONSE:

The testimony of ComEd witness William McNeil clearly establishes that ComEd is recommending that Dr. LaCasse be the Auction Manager. However, Dr. LaCasse has not yet been retained as the Auction Manager by ComEd.

In answering this question, it will be assumed that the term Auction Manager refers to Dr. LaCasse and that the question applies to her experience in other auctions in which she has been the Auction Manager.

Dr. LaCasse has managed seven BGS auctions in New Jersey and one CBP auction in Ohio in which the Auction Manager has the ability to pause the auction. The pauses initiated by the Auction Manager are called "time-outs" (a recess is a pause requested by a bidder). The ability to call time-outs allows the Auction Manager to provide bidders with additional time in case of a volume adjustment or an extraordinary event, and allows the Auction Manager to deal with technical difficulties in the conduct of the auction as may occur from time to time.

For all of the auctions mentioned above, NERA has agreed that it would not release information concerning the conduct of those auctions and events that occurred on a round-by-round basis. Hence, NERA is unable to provide "complete details, including complete logs of the events that required such delays in every instance". However, information is provided in the public report of the Auction Advisor (Charles River Associates, "CRA", in all instances) and for the Ohio Auction, in a NERA public report. Each public report addresses any delays that were experienced in the Auction. The witness has reviewed those reports and excerpted all references to time-outs that were called during the auction or any other auction delays. These are provided in italics below. The 2005 report for New Jersey has not been released and the witness will update the answer once it is released.

2002 New Jersey CRA Report

- *During the BGS auction, round 8 had to be re-started because, as we were told, the software was not accepting or confirming bidders' bids. The auction schedule subsequently was moved back by 30 minutes.*

- *In round 24, the schedule was moved back by 2 minutes. We were informed this was done to allow the Auction Manager team sufficient time for double-checking the bids.*
- *A time out was called by the Auction Manager in round 51, and the results for the reporting phase were delayed by about 15 minutes.*
- *We were informed that in round 60 the software was violating an auction rule having to do with the price assigned to retained switches. This caused a delay of about one hour.*
- *A time out was called by the Auction Manager in round 64 due to the software violating an auction rule concerning outbid disallowed switches and the use of time stamps. A similar problem occurred in round 66. Manual intervention was required by the Auction Manager team to override the software error.*
- *There was a delay of several minutes in round 65.*
- *There was a five minute pause in the auction in round 71 due to technical difficulties experienced by a bidder and back-up bidder.*

2003 New Jersey CRA Report

- *During round 7 of the FP auction, bidders lost access to the system. From our discussions with members of the Auction Manager team at the time, we understand that the problem was related to a malfunction with a piece of software they referred to as "Tomcat". The round had to be annulled and restarted, approximately one hour later. Aside from the one-hour delay, there was no apparent effect on the auction.*

There was no mention of delays or time-outs in the CIEP Auction portion of the CRA report.

2004 NJ CRA Report

"3.7. Were there any unanticipated delays during the auctions?"

No, there were no unanticipated delays."

Ohio CRA Report and NERA Public Report

"Were there any unanticipated delays during the CBP auction?"

No."

Witness who can testify subject to appropriate, in-scope cross examination: Chantale LaCasse